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Attorney for Defendant  
CARLOS EFRAIN PEREZ

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,	)	Case No. 1:21-cr-00179-JLT-SKO
	)	
Plaintiff,	)	
	)	STIPULATION AND ORDER TO CONTINUE
vs.	)	STATUS CONFERENCE
	)	
CARLOS EFRAIN PEREZ	)	
	)	
Defendant.	)	Date: February 4, 2022
	)	Time: 9:00 a.m.
	)	Judge: Hon. Jennifer L. Thurston
	)	

IT IS HEREBY STIPULATED by and between Phillip A. Talbert, United States Attorney, through Katherine Schuh, Attorney for Plaintiff and Heather Williams, Federal Defender, through Assistant Federal Defender Douglas Beevers, Attorney for Defendant Carlos Efrain Perez, that the status conference be continued to February 11, 2022 and that the Court exclude time pursuant to the Speedy Trial Act.

Defense counsel needs additional time to consult with Mr. Perez regarding his case. The government does not object to this continuance.

Defense counsel believes that failure to grant the above-requested continuance would deny her the reasonable time necessary for effective preparation, taking into account the exercise of due diligence and the difficulties that the COVID-19 pandemic creates for effective client preparation and consultation.

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1 Based upon the foregoing, the parties agree time under the Speedy Trial Act should be  
2 excluded from this order's date through and including February 11, 2022, as previously ordered,  
3 pursuant to 18 U.S.C. §3161 (h)(7)(A) and (B)(iv) [reasonable time to prepare] and General  
4 Order 479, Local Code T4 based upon continuity of counsel and defense preparation.

5 Dated: February 2, 2022

6 HEATHER E. WILLIAMS  
Federal Defender

7 /s/ Douglas Beevers  
8 DOUGLAS BEEVERS  
Assistant Federal Defender  
9 Attorney for Defendant  
CARLOS EFRAIN PEREZ

10 Dated: February 2, 2022

11 PHILLIP A. TALBERT  
United States Attorney

12 /s/ Katherine Schuh  
13 KATHERINE SCHUH  
Assistant United States Attorney  
14 Attorney for Plaintiff

**ORDER**

IT IS HEREBY ORDERED, the Court, having received, read, and considered the parties' stipulation, and good cause appearing therefrom, adopts the parties' stipulation in its entirety as its order. The Court specifically finds the failure to grant a continuance in this case would deny counsel reasonable time necessary for effective preparation, taking into account the exercise of due diligence. The Court finds the ends of justice are served by granting the requested continuance and outweigh the best interests of the public and defendant in a speedy trial.

The Court orders the time from the date the parties stipulated, up to and including February 11, 2022, shall be excluded from computation of time within which the trial of this case must be commenced under the Speedy Trial Act, pursuant to 18 U.S.C. § 3161(h)(7)(A) and (B)(iv) [reasonable time for counsel to prepare] and General Order 479, (Local Code T4). **It is further ordered** the February 4, 2022 status conference shall be continued until February 11, 2022, at 9:00 a.m.

IT IS SO ORDERED.

Dated: **February 2, 2022**

  
UNITED STATES DISTRICT JUDGE